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July 17, 2017

**Via ECF**

The Honorable Steven C. Mannion, U.S.M.J.  
United States District Court for the District of New Jersey  
Martin Luther King, Jr. Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: *White et al. v. LG Electronics, Inc., et al.*,  
Civil Action No. 17-1775 (MCA)(SCM)**

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Dear Magistrate Judge Mannion:

This firm, together with Wilson Sonsini Goodrich & Rosati P.C., represents defendant LG Electronics, U.S.A., Inc. ("LG") in the above-captioned action. We write to request an extension of time to answer, move, or otherwise respond with respect to the Class Action Complaint (the "Complaint") on behalf of LG.

LG was served on June 12, 2017, and obtained a clerks' extension to respond to the Complaint until today, July 17, 2017. Co-defendant Samsung Electronics America, Inc. ("Samsung") similarly obtained a clerk's extension until the same date, and on Friday, June 14, 2017, with the consent of Plaintiffs' counsel, Michael Berman, filed a stipulation extending its time until September 8, 2017 [ECF No. 12]. Co-defendant Sony apparently has not yet been served and has not appeared as of yet.

My co-counsel, Michael Rubin of Wilson Sonsini, reached an agreement with Mr. Berman to extend LG's time to respond to the Complaint until September 8, 2017. The goal of this extension was, among other things, to align LG's response date with the one that Samsung had reached with Plaintiffs and to allow defendants to better coordinate their responses to the Complaint. Samsung prepared and circulated a joint stipulation between Plaintiffs, Samsung, and LG last week for our consent.

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Late last Thursday night, however, we were advised by counsel for Samsung that Plaintiffs were denying agreement with LG for the extension, so Samsung separately filed its stipulation on Friday. We then reached out to Mr. Berman multiple times to confirm his consent, and prepared and sent a stipulation that would separately extend LG's time to respond until September 8. Mr. Berman responded Friday afternoon and disclaimed our prior extension agreement, and also said he was out of the office and would not be available again until today. We responded and again requested the courtesy of an extension to September 8 and have not heard back from Mr. Berman.

We respectfully request that LG be granted an extension to and including September 8, 2017, to respond to the Complaint. There is good cause for the requested extension and there can be no prejudice to Plaintiffs. This case is a putative class action that makes sweeping, largely collective allegations about all Smart TVs made by these three defendants, and LG plans to move to dismiss it. September 8 is the date for Samsung's response [ECF No. 13], and it makes sense to have defendants respond on the same date.

Accordingly, we respectfully request that LG's time to answer, move, or otherwise respond to the Complaint be extended to and including September 8, 2017.

Respectfully submitted,

*s/Jeffrey J. Greenbaum*

JEFFREY J. GREENBAUM

cc: All counsel of record (via ECF)

**SO ORDERED.**

Date: July \_\_, 2017

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HON. STEVEN C. MANNION, U.S.M.J.